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 SINCO TECHNOLOGIES PTE LTD

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

SINCO TECHNOLOGIES PTE LTD,

Plaintiff,

v.

SINCO ELECTRONICS (DONGGUAN) CO.,
 LTD.; XINGKE ELECTRONICS
 (DONGGUAN) CO., LTD.; XINGKE
 ELECTRONICS TECHNOLOGY CO., LTD.;
 SINCOO ELECTRONICS TECHNOLOGY
 CO., LTD.; MUI LIANG TJOA (an
 individual); NG CHER YONG aka CY NG (an
 individual); and LIEW YEW SOON aka
 MARK LIEW (an individual),

Defendants.

Case No. 3:17CV5517

Date Action Filed: 9/22/2017

**PLAINTIFF'S REPLY IN SUPPORT OF
 ITS MOTION FOR DEFAULT
 JUDGMENT**

[Fed. Rules Civ. Proc. § 55(b)(2)]

Judge: Honorable Edward M. Chen

Date: TBD

Time: TBD

Courtroom: 1, 17th Floor

Plaintiff SINCO TECHNOLOGIES PTE LTD. ("SINCO" or "SinCo" or "Plaintiff")
 respectfully submits this Reply brief in support of its Motion for Default Judgment against
 Defendant SINCOO ELECTRONICS TECHNOLOGY CO., LTD. ("SINCOO") pursuant to Fed.
 Rules Civ. Proc. § 55(b)(2) [ECF 619 – 619-3].

I. NO OPPOSITION BY DEFENDANT IN DEFAULT SINCOO

Defendant SINCOO ELECTRONICS TECHNOLOGY CO., LTD has not responded to
 Plaintiff SINCO TECHNOLOGIES PTE LTD's Motion for Entry of Default Judgment. [ECF

619 – 619-3.] Its Opposition or Statement of opposition was due filed and served on December 20, 2021. However, no opposition or statement of non-opposition has been filed by Defendant SINCOO as required by Local Rule 7-3. As such, SINCO’s Motion for Default Judgment should be granted.

II. DEFAULT JUDGMENT IS APPROPRIATE UNDER THE EITEL FACTORS

SINCO’s moving memorandum of points and authorities and supporting papers [ECF 619 -619-3], incorporated by reference here, SINCO’s request for default judgment establishes the Eitel factors weigh in favor of SINCO and entry of default judgment against Defendant SINCOO.

III. CONCLUSION

For all of the reasons discussed above and in the moving papers, Plaintiff respectfully requests that this Court grant default judgment against the Defendant SINCOO in the amount of \$800,000 and permanently enjoin Defendant SINCOO from infringing on the SINCO and SINCOO marks in the future. Plaintiff also requests this Court grant its costs in this action.

Dated: December 22, 2021

Respectfully submitted,

ROPERS MAJESKI PC

By: /s/ Lael D. Andara

LAEL D. ANDARA

ERNEST E. PRICE

Attorneys for Plaintiff

SINCO TECHNOLOGIES PTE LTD